

746 Glen Oaks Rd.  
Thousand Oaks, CA. 91360  
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Food and Drug Administration  
5630 Fishers Lane, Room 1061  
Rockville, Maryland 20852

Re: Docket # 98N-1038, "Irradiation in the Production, Processing and Handling of Food"

To whom it may concern:

I strongly feel that the current labeling law regarding irradiated foods should remain intact by the FDA in all respects, including terminology currently used such as "treated with radiation" or "treated by irradiation". There should be no attempt to mislead the consumer by using terms such as "cold pasteurization". Additionally, the international radura symbol should be present on all irradiated whole foods.

The FDA initially concluded that irradiation was a "material fact" regarding the processing of a food and should be disclosed. There is no logical reason why labeling requirements should change since this has already been established.

The consumer should have the ability from the labeling to determine whether food products are acceptable to them. The FDA has made great strides in making a standard nutrient label on all packages that provides the consumer such valuable information like fat, cholesterol and vitamin content. Since the irradiation process affects nutrient potency and other factors such as spoilage characteristics and texture, the continuation of labeling irradiated foods is mandatory.

The label should be prominent enough to be readily visible to the consumer on the front of the package with the inclusion of the radura and specifying the term "irradiation". Since not everyone is familiar with the radura it is especially important to include a term such as "treated with irradiation". It is vital that the consumer is not deceived and can make an informed choice on whether to purchase an irradiated product. The current labeling requirements meet these criteria and should not be changed.

Sincerely,

  
Dave Dolnick

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